

**EPA and NJDEP Follow-Up to TRC's Response to Agency Comments
on the 2nd Semiannual Monitoring Report 2014
Dayco Corporation/L.E. Carpenter Site, Wharton, New Jersey**

Follow-Up to Response #1: As a clarification, the results of any sampling that is or will be conducted on a routine basis (in addition to or in conjunction with the quarterly monitoring) may be reported in the semiannual reports. All other sampling results should be reported in a stand-alone document.

Follow-Up to Response #5: Analytical results from filtered groundwater samples cannot be used to determine that groundwater delineation is complete; samples must be unfiltered. An evaluation of the well construction and sampling techniques may be needed in order to reduce or eliminate any problems related to turbidity in unfiltered samples.

In addition, as explained during the July 15, 2015 site visit/meeting, the extent of DEHP contamination in the groundwater must be fully delineated (both horizontally and vertically). In order for groundwater delineation to be considered complete, the requirements for the submission of a Classification Exception Area (CEA) proposal to the NJDEP, in accordance with N.J.A.C. 7:26C-7.3, must be met.

Follow-Up to Response #8: This response states, "Results from pore water and groundwater locations will continue to be evaluated against the New Jersey Ground Water Quality Criteria (NJGWQC) for compliance purposes." Until further investigation of the Eastern Drainage Ditch and Rockaway River is conducted, any exceedance of the NJSWQC in the adjacent monitoring wells assumes that NJSWQC are also exceeded in the surface water and sediment pore water. Therefore, data collected from wells located adjacent to the river and drainage ditch must be evaluated against NJSWQC for compliance purposes.

Follow-Up to Response #10: Please refer to Follow-Up to Response #5 above regarding the use of filtered samples for delineation purposes. The information provided on the different methods of phytoremediation mechanisms is noted. As a clarification, in order for the pilot study to be expanded, the results of the study must clearly demonstrate that contaminant levels are declining due to phytoremediation processes.

Follow-Up to Response #11: A comprehensive, stand-alone MNA evaluation report must be submitted for Agency consideration.